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Management LLC, Debtor and Debtor-in-Possession*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

NJ HEALTHCARE FACILITIES MANAGEMENT
LLC a/k/a NEW JERSEY HEALTH CARE
FACILITIES MANAGEMENT LLC d/b/a
ADVANCED CARE CENTER AT LAKEVIEW,

Debtor.

Chapter 11

Case No. 15-14871 (VFP)

Honorable Vincent F. Papalia

APPLICATION FOR EXPEDITED CONSIDERATION OF FIRST DAY MATTERS

**TO: THE HONORABLE VINCENT F. PAPAPLIA
UNITED STATES BANKRUPTCY JUDGE**

On March 19, 2015, NJ Healthcare Facilities Management LLC a/k/a New Jersey Health Care Facilities Management LLC d/b/a Advanced Care Center at Lakeview, Chapter 11 debtor and debtor-in-possession (the “Debtor”), filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

Proposed counsel for the Debtor, Trenk, DiPasquale, Della Fera & Sodono, P.C., hereby requests that the following relief be provided on a first day basis:

1.	<input checked="" type="checkbox"/>	Application for an Order (A) Authorizing Debtor to Continue Using Existing Cash Management System, Bank Accounts, and Business Forms; and (B) Granting a Waiver of the Deposit Guidelines Set Forth in Section 345 of the Bankruptcy Code [Docket No. 6]
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2.	<input checked="" type="checkbox"/>	Application in Support of Motion Pursuant to 11 U.S.C. §§ 105, 363(b), and 507(a)(7) for an Order Authorizing Continuation of Certain Custom Practices [Docket No. 7]
3.	<input checked="" type="checkbox"/>	Application for a Bridge Order and a Final Order (I) Prohibiting Utility Companies from Discontinuing, Altering, or Refusing Service; (II) Deeming Utility Companies to Have Adequate Assurance of Payment; and (III) Establishing Procedures for Resolving Requests for Additional Assurance Pursuant to 11 U.S.C. §§ 105(a) and 366 [Docket No. 8]
4.	<input checked="" type="checkbox"/>	Application for an Order Pursuant to 11 U.S.C. §§ 105(a), 507(a)(4) and 507(a)(5): (I) Authorizing Debtor to Pay Pre-Petition Wages, Salaries, and Payroll-Related Taxes for Pre-Petition Periods; (II) Directing All Banks to Honor Pre-Petition Checks for Payment of Pre-Petition Employee Obligations; (III) Authorizing the Debtor to Honor Workers' Compensation and Certain Employee Benefit Obligations [Docket No. 9]
5.	<input checked="" type="checkbox"/>	Application for an Administrative Order Pursuant to 11 U.S.C. §§ 105(A) and 331 Establishing Certain Procedures for the Allowance of Interim Compensation and Reimbursement of Expenses of Professionals Retained by Order of this Court [Docket No. 10]

Respectfully submitted,

**TRENK, DiPASQUALE,
DELLA FERA & SODONO, P.C.**
*Proposed Counsel to NJ Healthcare Facilities
Management LLC, Debtor and Debtor-in-
Possession*

By: /s/ Anthony Sodono, III
ANTHONY SODONO, III

Dated: March 20, 2015

NOTE: Each Motion or Application for which expedited consideration is requested shall be filed with the Clerk of the United States Bankruptcy Court for the District of New Jersey and served upon the United States Trustee and all affected parties.